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DANA H. BILLINGSLEY

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February 27, 2008

By Federal Express

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 30554

Attn: Chief, Media Bureau

**Re: Pine Belt Telephone Company, Inc.'s Annual 47 C.F.R. § 64.2009(e) CPNI
Compliance Certification
EB Docket No. 06-36**

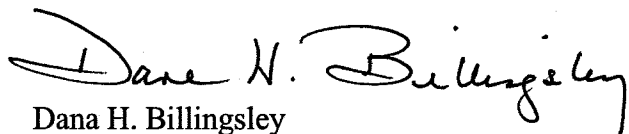
Dear Ms. Dortch:

On behalf of Pine Belt Telephone Company, Inc., we submit the original and four (4) copies of the above-referenced annual CPNI Compliance Certification. We have also filed a copy of this Certification electronically in EB Docket No. 06-36 and have provided two (2) courtesy copies to the Commission's Enforcement Bureau and one (1) copy to Best Copy and Printing, Inc., as required under the Commission's Public Notice, DA 08-171 (released January 29, 2008).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



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Enclosure

cc: John Nettles
FCC Enforcement Bureau
Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 27, 2008

Name of company covered by this certification: Pine Belt Telephone Company, Inc.

Form 499 Filer ID: 801888

Name of signatory: John Nettles

Title of signatory: President

In response to the Commission's Public Notice, DA 08-171 (released January 29, 2008), Pine Belt Telephone Company, Inc., states as follows:

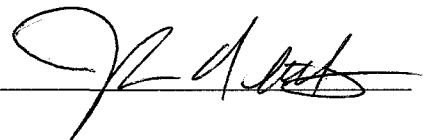
I, John Nettles, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. §§ 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in sections 64.2001, *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed

A handwritten signature in black ink, appearing to read "John Nettles", is written over a horizontal line.

**Before the
Federal Communications Commission
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT
OF
PINE BELT TELEPHONE COMPANY, INC.**

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Pine Belt Telephone Company, Inc., (hereinafter, "Pine Belt") files the following statement of compliance with the requirements set forth in 47 C.F.R. §§ 64.2001, *et seq.* on behalf of Pine Belt:

1. I have personal knowledge that Pine Belt has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Pine Belt obtains written approval for the use of its customers' CPNI and that Pine Belt has notified its customers of their right to restrict Pine Belt's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Pine Belt has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. §§ 64.2001, *et seq.* and that Pine Belt has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Pine Belt implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Pine Belt maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Pine Belt retains all such records for a minimum period of one year.
6. I have personal knowledge that Pine Belt has established a supervisory review process regarding Pine Belt's compliance with outbound marketing situations and that Pine Belt maintains records of such compliance for a minimum period of one year. Pine

Belt's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Pine Belt has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this 22nd day of February, 2008.

PINE BELT TELEPHONE COMPANY, INC.

By:



John Nettles
President